

30 June 2008

SUBMISSION IN RESPONSE TO: INQUIRY INTO THE ADMINISTRATION OF THE CIVIL AVIATION SAFETY AUTHORITY (CASA) AND RELATED MATTERS

About AGAA

The concept of self-administration by sport and recreational aviation bodies has been so outstandingly successful that a number of bodies involved in private general aviation operations wish to emulate this success. These bodies have combined to form AGAA to negotiate the devolvement of private GA operations to a self-administering body. The combined membership of these aviation bodies exceeds 10,000 members.

Administration of CASA

During his tenure as CEO of CASA, Bruce Byron has enunciated certain principles, which are of great value to the efficient, effective administration of aviation. Some of these are

- the priority of CASA is the protection of the fare-paying passenger
- industry participants must run their businesses safely and be accountable to CASA for the safety outcomes,
- operations other than passenger and freight operations should, where feasible, be delegated to accountable self-administering bodies.

AGAA believes that these principles are a sound basis for achieving superior safety outcomes while allowing the aviation industry to innovate and develop both domestically and in global markets. In particular, the practical outcome of these principles is that CASA shall no longer tell a participant how to run his business, but shall provide safety information and shall closely monitor results and require successful outcomes.

It is our observation that opposition to this approach by CASA comes from two sources.

1. Certain sections of the industry, notably smaller training and maintenance operations, are finding it hard to adapt to a non-prescriptive regulatory system. They are used to having the **inputs** of their operations controlled by CASA, where the local CASA officials tell them what they can and cannot do. However to now be accountable for the safety **outcomes**, they have to learn a new set of skills required determining their own inputs and safety systems.

2. Certain CASA officials, usually lower in the ranks, can think only in terms of the old prescriptive methods. They tend to block the transformation of CASA.

These two sources of opposition indicate that the transformation will take considerable time to complete. The CEO has recruited some excellent talent at senior level. AGAA believes that it would be a mistake not to give this renewal process time to propagate through industry and CASA and become established.

We note that these reforms include the most ambitious reform of the regulations in a generation. This reform program is under-resourced and is too protracted, leading to confusion in the industry. This protraction is exacerbated by insufficient legal drafting resource in the Attorney General's Department.

AGAA supports the general thrust of Bruce Byron's reforms, but would like to see more resources applied to change management and legal drafting.

Sincerely

President (Acting)

CC Mr Peter Bennett – Secretary AGAA